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NOV 14 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

C. William McGlocklin
SKF USA, Incorporated
1100 First Avenue
King of Prussia, Pennsylvania 19406-1352

RE: 2320 Marconi Avenue
EPA I.D. #MOT300010345
Information Pursuant to Completion
of RCRA Facility Assessment

Dear Mr. McGlocklin:

The Environmental Protection Agency (EPA) is currently conducting a Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) on the facility located at 2320 Marconi Avenue, St. Louis, Missouri, which is owned and operated by SKF USA, Incorporated. In order to complete the RFA, we require the following information:

When reference is made to a Solid Waste Management Unit (SWMU) in this letter, the following definition shall apply:

A SWMU is any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released. Examples of SWMUs include: landfills, surface impoundments, waste piles, land treatment units, incinerators, injection wells, above and below ground tanks (including 90-day accumulation tanks), transfer stations, drum storage areas, and waste recycling operations. In addition, the Agency has interpreted the term to apply to areas associated with production processes which have become contaminated as a result of routine and systematic releases of hazardous waste or hazardous constituents (a product may become a waste if it is discarded or abandoned).

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RCRA Records Center

Section 3007 of RCRA, 42 USC Section 6927, provides that any person who generates, stores, treats, transports, disposes of or has handled hazardous wastes shall upon request provide information to EPA for the purposes of enforcing the provisions of Title II of RCRA. Pursuant to the provisions of Section 3007 of RCRA, SKF USA, Inc., shall provide the following information to EPA:

1. A map of the entire facility clearly labeling property boundaries, buildings, and all SWMUs, present and past. This map shall indicate the scale and/or be adequately dimensioned.
2. A detailed list of all SWMUs. Each SWMU shall be labeled and clearly identified on a facility map. Include the following information for each SWMU:

- ° description of SWMU, (supply any available drawings),
- ° whether there is/was secondary containment,
- ° volume of SWMU,
- ° current contents of SWMU,
- ° material of construction,
- ° date(s) of installation,
- ° historical contents,
- ° historical use,
- ° date of closure,
- ° closure procedures,
- ° date(s) and quantity(ies) of any releases of hazardous waste or hazardous constituents,
- ° corrective measures or response to release(s).

In regard to any prior release described above, provide for each unit any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. In responding, focus on concentrations of hazardous wastes or hazardous constituents present in contaminated soil, groundwater, surface water, and/or air.

Your facility may, if it desires, assert a business confidentiality claim covering part or all of the information submitted to, or reviewed by, EPA. Such a claim may be made by placing on (or attaching to) the information, at the time of its submittal to EPA, a cover sheet, stamped or printed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise nonconfidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by EPA. If confidential treatment is sought only until a certain date or until the occurrence of a certain event, the request should so state.

Information submitted for which a claim of confidentiality is made will be disclosed by EPA only to the extent and by means authorized by the procedures specified in 40 CFR Part 2, Subpart B. If no such claim is made when information is received by EPA, information may be made available to the public without further notice.

EPA hereby requests that the information requested above be furnished within twenty (20) days of your receipt of this letter. Your failure to respond with complete and accurate information may subject you to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928. Such enforcement action may include the assessment of penalties of up to twenty-five thousand dollars (\$25,000) for each day of non-compliance.

You are requested to submit this information to:

Diane Huffman
Compliance Section, RCRA Branch
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

If you have any questions in regard to this letter, please contact Diane Huffman, of my staff, at (913) 551-7544.

Sincerely yours,

Michael J. Sanderson
Chief, RCRA Branch

cc: Dave Freise ✓
Missouri Department of Natural Resources

P 679 715 002



Certified Mail Receipt

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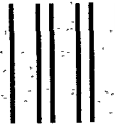
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R.C.R.



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Environmental Protection Agency

WSTM/RCOM

726 Minnesota Avenue

Kansas City, Kansas 66101

Huffman



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3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to the back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number
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6. Save this receipt and present it if you make inquiry. U.S.G.P.O. 1990-270-153

PS Form 3800, June 1990 (Reverse)

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<p>3. Article Addressed to: C. William McGlocklin SKF USA, Incorporated 1100 First Avenue King of Prussia, Pennsylvania 19406-1352</p>	<p>4. Article Number P 679 715 002</p> <p>Type of Service:</p> <table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> Registered</td> <td><input type="checkbox"/> Insured</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified</td> <td><input type="checkbox"/> COD</td> </tr> <tr> <td><input type="checkbox"/> Express Mail</td> <td><input type="checkbox"/> Return Receipt for Merchandise</td> </tr> </table> <p>Always obtain signature of addressee or agent and DATE DELIVERED.</p>	<input type="checkbox"/> Registered	<input type="checkbox"/> Insured	<input checked="" type="checkbox"/> Certified	<input type="checkbox"/> COD	<input type="checkbox"/> Express Mail	<input type="checkbox"/> Return Receipt for Merchandise
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<p>5. Signature — Addressee X <i>Marty Jacobson</i></p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>						
<p>6. Signature — Agent X</p>							
<p>7. Date of Delivery 11/19/91</p>							